

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**UNITED STATES OF AMERICA,  
Plaintiff,**

**v.**

**[1] WANDA VÁZQUEZ GARCED,  
[2] JULIO M. HERRERA VELUTINI,  
[3] MARK T. ROSSINI,  
Defendants.**

**CRIMINAL NO. 22-342 (SCC)**

**DESIGNATION OF EVIDENCE**

The United States of America provides the following designation of evidence in compliance with the Court's Order and in accordance with Rule 12(b)(4)(B).

**Relevant Legal Authority**

Rule 12 of the Federal Rules of Criminal Procedure provides, in relevant part, that “the defendant may, in order to have an opportunity to move to suppress evidence under Rule 12(b)(3)(C), request notice of the government’s intent to use (in its evidence-in-chief at trial) any evidence that the defendant may be entitled to discovery under Rule 16.” The Advisory Committee’s Note accompanying this Rule makes it clear that the Rule’s purpose is to ensure a defendant “can make his motion to suppress prior to trial” by “request[ing] the government to give notice of its intention to use specified evidence which the defendant is entitled to discovery under Rule 16.” Rule 12, Fed. R. Crim. P. Advisory Committee’s note. The government’s obligation ends when it has made disclosures that sufficiently allow the defendant to make informed decisions about motions to suppress evidence. “Rule 12(d) was not designed to aid the defendant in

ascertaining the government's trial strategy, but only in effectively bringing suppression motions before trial." *United States v. de la Cruz-Paulino*, 61 F.3d 986, 994 (1st Cir. 1995).<sup>1</sup>

"Put differently, defendants cannot invoke Rule 12(b)(4)(B) to force the government to decide precisely which documents provided in discovery it will offer at trial and to prevent it from using any that it does not so designate as a matter of trial tactics." *United States v. Ishak*, 277 F.R.D. 156, 159 (E.D.V.A. 2011) (quoting *United States v. El-Silimy*, 228 F.R.D. 52, 57 (D. Me. 2005)).

Notwithstanding the above, the United States has sought to provide a comprehensive list of evidence it intends to admit at trial.

### **United States's Designation of Evidence**

The United States designates all the evidence below, which has been disclosed to the defendants in the discovery process, and reserves the right to add or delete items from this designation. Further, the United States has described persons herein via initials or other identifiers. The identities of the persons are known to defendants as a result of their possession of the discovery and documents described herein.

1. All content from John Blakeman's cellphone responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
2. All content obtained from Frances Diaz's cellphones responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.

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<sup>1</sup> Consistent with this legal authority, the United States reserves the right to introduce evidence not specifically listed herein. The United States respectfully requests that the Court set a deadline for all parties to provide exhibit lists and exhibit binders at least three weeks prior to trial.

3. All content from Individual A's cellphone responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
4. All content from Individual B's cellphone responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
5. All content from Defendant Julio M. Herrera Velutini's Apple Account responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
6. All content from Defendant Julio M. Herrera Velutini's Yahoo Account responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
7. All content from Defendant Mark T. Rossini's Apple Account responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
8. All content from Defendant Mark T. Rossini's Google Account responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
9. All content from Defendant Wanda Vazquez Garced's phone responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
10. All content from Defendant Wanda Vazquez Garced's Apple Account responsive to the corresponding search warrant and that supports the facts underlying Counts One, Two, Three and Four of the Indictment.

11. Bank records from JP Morgan, PNC Bank , Barclay's, and HSBC responsive to the corresponding search warrant and that support the facts underlying Counts One, Two, Three and Four of the Indictment, including the payment of political consulting services to benefit Vazquez's election campaign.
12. Records obtained from Individual C that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
13. Records obtained from International Consulting Firm that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
14. Records obtained from Political Consultant A that supports the facts underlying Counts One, Two, Three and Four of the Indictment.
15. Records obtained from the political consultant J.C. that support the facts underlying Counts One, Two, Three and Four of the Indictment.
16. Records obtained from Frances Diaz that support the facts underlying Counts One, Two, Three and Four of the Indictment.
17. Records obtained from Wanda Vazquez's Chief of Staff that support the facts underlying Counts One, Two, Three and Four of the Indictment.
18. Records obtained from Wanda Vazquez's Secretary of Public Affairs that support the facts underlying Counts One, Two, Three and Four of the Indictment.
19. Records of The Bank and the Holding Corporation, identified in paragraphs 5 and 6 of the Indictment, that support the facts underlying Counts One, Two, Three and Four of the Indictment.
20. Records of MTR Associates that support the facts underlying Counts One, Two, Three and Four of the Indictment.



21. Records of Britannia Global Investments and Britannia Financial Services Ltd., that support the facts underlying Counts One, Two, Three and Four of the Indictment.
22. Records obtained from JPMC that support the facts underlying Counts One, Two, Three and Four of the Indictment.
23. Records obtained from the Federal Elections Commission that support the facts underlying Counts One, Two, Three and Four of the Indictment.
24. Photographs related to Items 1 through 150 of the Chart below that support the facts underlying Counts One, Two, Three and Four of the Indictment.
25. Attachments related Items 1 through 150 of the Chart that support the facts underlying Counts One, Two, Three and Four of the Indictment.
26. All messages related to the Diario Las Americas 2020 article about Wanda Vazquez.
27. All 2019 and 2020 messages related to interactions and/or meetings with Political Consultant A.
28. The following items:

No.	Date	Description	Bates Start	Bates End
1.	2019.12.02	MM messages Individual A via WhatsApp and reminds her that she ( Individual A) will be meeting with Individual C- PG on 12/03/19 at 3:15pm.	<u>DOJ-0001199470</u>	<u>DOJ-0001199470</u>
2.	2019.12.03	Wanda Vazquez sends a text message to Individual A asking “what’s the Indu’s name?”, to which Individual A responds” Individual C.”	<u>DOJ-0001193483</u>	DOJ-0001193483

No.	Date	Description	Bates Start	Bates End
3.	2019.12.14	Individual A communicates with Wanda Vazquez via WhatsApp and tells her that Individual C called Individual A to let her know they have 6 front row tickets to see “Marc” and that Individual C asked for them to wait in the back entrance so he can take them backstage to meet “Marc”	<u>DOJ-0001204339</u>	DOJ-0001204339
4.	2019.12.15	Herrera communicates with Diaz via WhatsApp and tells her “I spoke with John last night! must enter Fortaleza and support the new governor”, “Use a paving roller over OCIF and build a new structure that regulates and doesn’t persecute the banks and change documents or fabricate documents against the banks.”	<u>DOJ-0004239052</u>	DOJ-0004239052
5.	2019.12.16	Individual B messages Individual D via WhatsApp to let him know about the meeting that will be held at the Berwind board room at the Vanderbilt hotel at 6.	<u>DOJ-0000655082</u>	DOJ-0000655083
6.	2019.12.16	Individual C messages Individual A while he is in a meeting that he is having at his house with John Blakeman and Individual D. Individual C sends Individual A a picture of him with Blakeman and Individual D at the meeting. Later Individual A tells Individual C “Do you have a private room for a meeting with the Governor, Individual D, Blakeman and me at 6pm? The announcement will be this afternoon. We already schedule a meeting at 3pm with the Cabinet. Let me know please!” Individual C responds “Berwind boardroom. All set. 6pm. Vanderbilt. Its ocean front. Round table.”	<u>DOJ-0001189809</u>	DOJ-0001190189
7.	2019.12.17	Herrera asks Blakeman how “they’re” doing with Wanda Vazquez, and tells him they need to support and that she could win. Blakeman responds that There’s been a lot of “good things” going on, and tells Herrera he had a meeting at Individual C’s house on 12/16/20 and then later met with the Governor at the Vanderbilt at night.	<u>DOJ-0001185960</u>	DOJ-0001185961



No.	Date	Description	Bates Start	Bates End
8.	2019.12.17	Text messages from Julio Herrera to Blakeman containing a link to the International Consulting Firm's website and about how the International Consulting Firm could make their "friend" win. Blakeman response to Julio Herrera, that "[w]e'll present [the information to him/her] when you get here. In the meantime, I will present the information to the campaign group."	<u>DOJ-0001185962</u>	DOJ-0001185964
9.	2019.12.17	John Blakeman messages Individual B via WhatsApp and asks her for AP's contact information. Individual B provides the shared contact.	<u>DOJ-0001188288</u>	DOJ-0001188622
10.	2019.12.18	Individual A's text message to Individual C to let Individual C know that Vazquez would be attending Individual C's wedding. Individual C response that he would be seating Vazquez with three billionaires. Individual C text sending Individual A internet links and a screenshot providing information about the three purported billionaires, including Herrera.	<u>DOJ-0001189809</u>	DOJ-0001190189
11.	2019.12.20	Individual C messages Individual A via text message and lets her know that there will be 3 billionaires sitting with Governor Vazquez at the wedding dinner. Individual C also sends Individual A a picture of a table that lists the guests that will be sitting at the table with Vazquez	<u>DOJ-0001189809</u>	DOJ-0001190189
12.	2019.12.25	Wanda Vazquez communicates with Individual A via WhatsApp, wishes her Merry Christmas, and asks her to send her the contact information of those Individual A believes Vazquez should send Christmas greetings to. Individual A suggests Vazquez sends her greetings to "Individual C and FS" and shares with Vazquez their contact information.	<u>DOJ-0001204270</u>	DOJ-0001204825

No.	Date	Description	Bates Start	Bates End
13.	2019.12.26	Blakeman attends a meeting at Wanda Vazquez's house in Montehiedra at 5pm	<u>DOJ-0000657965</u>	DOJ-0000657965
14.	2019.12.28	Diaz tells Blakeman via WhatsApp that Herrera is asking her if Blakeman is sure that Vazquez will be attending Individual C's wedding because, if that's the case, Herrera would deviate from his trip to Canada and travel to PR to attend the wedding.	<u>DOJ-0004238918</u>	DOJ-0004238918
15.	2020.01.02	Individual C messages Individual A and sends her a picture of a piece of paper that contains pictures and descriptions of a series of individuals, including "Julio Herrera M – Owner Bancredito." Individual C offers to send the document via email to Individual A the document so she can print it "to help the Governor with the vip at the event." Individual A responds "Ok! I'll study everyone!"	<u>DOJ-0001189915</u>	DOJ-0001189916
16.	2020.01.03	Individual D sends a Screenshot to Vazquez's Chief of Staff and Blakeman (via WhatsApp group chat). Blakeman responds with thumbs up emojis. Then Individual D says "the female boss will call him, the between the lines is that supporting her is fruitful"	<u>DOJ-0001187825</u>	DOJ-0001187826
17.	2020.01.03	Blakeman messages Individual B in group chat and asks if she's attending the wedding the next day. When Individual B replies that she is, Blakeman then reminds her that Julio Herrera, who is owner of Bancredito and is supporting "them", will be there. Blakeman tells Individual B that Herrera sent him information of a company in the UK that ran a campaign in England and to which Herrera had already talked to about Vazquez. Individual A then adds that she has the biography and picture of everyone seating with Vazquez at the wedding and will review with Vazquez so she is familiar with them when she attends the event.	<u>DOJ-0001207647</u>	DOJ-0001207650



No.	Date	Description	Bates Start	Bates End
18.	2020.01.04	Herrera texts Blakeman (via WhatsApp) “here at the dinner with your friend.” Blakeman responds “how is it going? I have an appointment with her tomorrow at 1” “[She’s] going to win the elections if [she] has the support from you all.” Herrera then says “[She] has it!! In this table [she] already has 2MM.” Blakeman responds with 3 thumbs up emojis. Then Herrera proceeds to say “but [she] has to resolve ocif”, followed by a laughing face emoji. Herrera later tells Blakeman “[She] already left!!!! said goodbye to JP and me !!!!!” “JP told her that he would do whatever is necessary so that I don’t leave PR.” Herrera also tells Blakeman “Individual C will also donate in his personal capacity!!!! “I’m here as fund reiser [sic]”, “T is also in”	<u>DOJ-0001185975</u>	DOJ-0001185979
19.	2020.01.04	Individual C Wedding. Herrera, P, and Vazquez seated together	<u>DOJ-0001182087</u>	DOJ-0001182087
20.	2020.01.05	Herrera messages Diaz via WhatsApp and tells her “At our table 2M were raised for the [female] governor”, “Now [sic] our rights must be defended! JP told me that we let time run and we needed to attack the problem that it is crazy! No institution can work like that and function at the same time”, “Jose Carrion was of the same opinion”, “I arrive in 10 days for the meeting with the madam”, “Greetings.” In response, Diaz asks Herrera if the madam was at the table and Herrera responds affirmatively. Herrera then proceeds to tell Diaz that [they] greeted her but did not discuss her electoral campaign, and much less OCIF. Herrera describes that the governor was relaxed dancing and he did not want to be remembered as the idiot that ruined her night with her husband.	<u>DOJ-0004239090</u>	DOJ-0004239092

No.	Date	Description	Bates Start	Bates End
21.	2020.01.06	Herrera sends Blakeman (via WhatsApp) information regarding Mark Rossini and International Consulting Firm and tells Blakeman that Rossini is working for CTF London and will be with Herrera in Puerto Rico. Later in the conversation Herrera asks Blakeman which secretary controls OCIF Blakeman responds "Right now the Chief of Staff. The new one with which Frances and I will meet. Tomorrow [he'll] tell me the date. But it should be this week. Remember he is in my campaign committee."	<u>DOJ-</u> <u>0001185981</u>	DOJ- 0001185985
22.	2020.01.10	Diaz asks Herrera to confirm his attendance for the meeting with Vazquez on 1/14/20 at 2:30pm. Herrera asks Diaz who is attending the meeting and Diaz responds "John, you and I."	<u>DOJ-</u> <u>0004239086</u>	DOJ- 0004239086
23.	2020.01.13	Blakeman messages Vazquez's Chief of Staff to confirm the meeting to be held on 1/14/20 at 10am. Vazquez's Chief of Staff asks Blakeman who will be attending the meeting and Blakeman responds that it will be Frances Diaz and himself. Vazquez's Chief of Staff confirms the meeting.	<u>DOJ-</u> <u>0001187735</u>	DOJ- 0001187736
24.	2020.01.13	Blakeman messages Individual A via WhatsApp and reminds her that Herrera would be flying that same night to see "G." The meeting is set to be held on 1/14/20 at 2pm.	<u>DOJ-</u> <u>0001198534</u>	DOJ- 0001198538
25.	2020.01.14	Herrera messages Diaz via WhatsApp saying "The solution is to fire the persons that have OCIF kidnapped and to put an interim commissioner that forms a international banking reform board where the banks and the government both participate to make clear the rules of the game and support Puerto Rico's economy more." Following Herrera's message, Diaz tells Herrera that the meeting with the [female] governor has been moved to 2pm and asks him to confirm his attendance. Herrera then confirms. Diaz asks Herrera if he wants Diaz to	<u>DOJ-</u> <u>0004239081</u>	DOJ- 0004239083

No.	Date	Description	Bates Start	Bates End
		accompany him at the meeting with the governor and Herrera responds “of course.”		
26.	2020.01.14	Individual A asks Individual B via WhatsApp if “Julio Herrera 2pm” sounds good to her. Individual B responds “Yes.”	<u>DOJ-0001202327</u>	DOJ-0001202327
27.	2020.01.14	Individual A sends a message to Wanda Vazquez via Telegram that reads “Call Paki!! It’ll be brief!”	<u>DOJ-0001211187</u>	DOJ-0001211187
28.	2020.01.14	Individual C messages Individual A and tells her she’s “missing in action” because “Julio Herrera is here!”. Individual C tells Individual A that Julio said the meeting was great and that Julio “is a supporter”, followed by a screenshot from a message by Herrera in which Herrera says “ready to support her.” Individual A then responds at approximately 9:26 pm that “she call u in an hour!” She’s doing her hair and nails right now!!!”	<u>DOJ-0001182013,</u> <u>DOJ-0001182014,</u> <u>DOJ-0001182015,</u> <u>DOJ-0001182016</u>	<u>DOJ-0001182013</u> <u>, DOJ-0001182014</u> <u>^ DOJ-0001182015</u> <u>^ DOJ-0001182016</u>
29.	2020.01.14	Individual A asks Individual C, via text message, how the call went and if he told her everything. Individual C responds “yes. I was super honest. She hear me sincerely. I talk honestly.”	<u>DOJ-0001182017</u>	DOJ-0001182017



No.	Date	Description	Bates Start	Bates End
30.	2020.01.15	Individual C messages Individual A via text message and tells her to ask John Blakeman about the meeting "today." Individual C tells Individual A he met with Julio for an hour on strategy "today."	<u>DOJ-0001190075</u>	DOJ-0001190075
31.	2020.01.15	Mark Rossini emails International Consulting Firm-Partner 1 of International Consulting Firm saying that Vazquez wants to utilize International Consulting Firm - Rossini reiterated to the partners at the International Consulting Firm that Herrera would be paying for their services, emailing International Consulting Firm-Partner 1 and International Consulting Firm-Partner 2, in part, "As an update Julio H., met with the current Governor and her Chief of Staff yesterday. The Governor is very excited about the prospect of utilizing [the International Consulting Firm] for her re-election campaign," and "[t]he campaign is actively raising funds, and will pay for a portion of [the International Consulting Firm]'s services. The bulk of the payment will be done by Julio H., and similarly wealthy individuals here whom are creating a super PAC. Julio H. will personally fund anything which is not covered by the campaign or PAC."	<u>DOJ-0001182093</u>	DOJ-0001182093
32.	2020.01.16	Individual C messages Individual A and tells her "per CTF they can be in San Juan the 26/27th of February. Good por todos? Individual A for CTF. Feb 26/27 is that ok?. " Individual A responds "let me check"	<u>DOJ-0001189809</u>	DOJ-0001190189
33.	2020.01.17	Blakeman forwards Frances Diaz a message he received from Julio in which he states his support for Wanda Vazquez. The message is the same that he received from Herrera earlier that same day	<u>DOJ-0004238900</u>	DOJ-0004238900



No.	Date	Description	Bates Start	Bates End
34.	2020.01.17	Herrera follows up (via WhatsApp) with Blakeman regarding the date for the interview with "Diario Las Americas." Blakeman tells Herrera that nothing has been confirmed yet but that he wants to work "with OCIF first." Herrera responds "that takes time and we don't control it" unlike that of the "Diario las Americas." Blakeman then responds "... tomorrow I'll be with the "lady" working on this and other things. Herrera then responds with a message restating his support for Vazquez	<u>DOJ-0001186002</u>	DOJ-0001186005
35.	2020.01.19	Rossini email stating International Consulting Firm will be financed by Herrera, P, and Individual C	<u>DOJ-0001182094</u>	DOJ-0001182099
36.	2020.01.20	Individual C messages Individual A via WhatsApp and asks Individual A if "Feb 28 ok for the governor to meet International Consulting Firm? Julio Herrera will come too. They are flying from london." In response, Individual A tells Individual C to remind her the next day so she can check the calendar.	<u>DOJ-0001195862</u>	DOJ-0001195863
37.	2020.01.22	Herrera messages Diaz via WhatsApp stating that Individual C told him that Vazquez wanted to know who to put in OCIF and tells Diaz that he sent Individual C "GM"'s information	<u>DOJ-0004239074</u>	DOJ-0004239074
38.	2020.01.22	John Blakeman sends a WhatsApp message to Individual A to tell her he heard that the insurance commissioner had "left" and ask when [that of] OCIF was taking place.	<u>DOJ-0001198540</u>	DOJ-0001198542
39.	2020.01.29	Individual A messages Blakeman "Working OCIF with Vazquez's Chief of Staff]!!"	<u>DOJ-0001186120</u>	DOJ-0001186120

No.	Date	Description	Bates Start	Bates End
40.	2020.01.30	Diaz WhatsApp message to Herrera saying that she was told “the dismissal is coming soon,” then states, “they understand to leave G acting like we talked about”	<u>DOJ-0006915717</u>	DOJ-0006915717
41.	2020.02.03	Diaz tells Blakeman to not forget about “that of the Commissioner.” Blakeman messages Frances Diaz and tells her that he “called Fortaleza “and he was told that the G’s instruction was given. “Update later.”	<u>DOJ-0004238895</u>	DOJ-0004238896
42.	2020.02.04	Frances Diaz tells Herrera that Blakeman was calling Individual A and that Diaz would be calling Herrera in “a few minutes” to see what happened.	<u>DOJ-0004239371</u>	DOJ-0004239371
43.	2020.02.05	Blakeman and Frances Diaz exchange messages about Wanda Vazquez being in Washington DC with Individual A. Diaz asks Blakeman if “she” told him “when they would be executing the instructions”	<u>DOJ-0004238893</u>	DOJ-0004238894
44.	2020.02.04	Blakeman asks Individual A for status on OCIF. Individual A texts Blakeman “In a meeting at WH.” (via text message)	<u>DOJ-0001183616</u>	DOJ-0001183616
45.	2020.02.05	Individual A messages Individual B via WhatsApp: “Blakeman calling! OCIF!!!”. Individual A also sends Individual B pictures of Wanda Vazquez, JG and another individual. Individual B responds by asking Individual A when “they” will be back from their second trip.	<u>DOJ-0001202434</u>	DOJ-0001202436



No.	Date	Description	Bates Start	Bates End
46.	2020.02.06	Diaz sends a message to Herrera via WhatsApp that reads "John spoke with Individual A in front of me she was still in the airplane." Later in the conversation Diaz continues to explain to Herrera that Individual A had told Blakeman that "the madam" had already given her instruction to the chief of staff and that the first thing she would do when she got back to the office was to call him.	<u>DOJ-</u> <u>0004239103</u>	<u>DOJ-</u> <u>0004239103</u>
47.	2020.02.07	Blakeman asks Individual A about the status with OCIF and Individual A says that the Chief of Staff already scheduled an appointment with him. Blakeman asks when the Commissioner is supposed to be leaving and Individual A doesn't respond.	<u>DOJ-</u> <u>0001186121</u>	DOJ- 0001186121
48.	2020.02.11	Individual A messages Vazquez's Chief of Staff via WhatsApp and asks I wanted to ask you if you talked with OCIF Commissioner A from OCIF.	<u>DOJ-</u> <u>0001194372</u>	DOJ- 0001194372
49.	2020.02.11	Individual A and Individual C exchange messages via WhatsApp. During the conversation, Individual A sends Individual C a picture of Wanda Vazquez and her husband on board of an airplane with a caption that reads "Weeee! Boarding from MIA to SJ!!." In response, Individual C tells Individual A "Finally!!!" "Don't forget, big meeting 28!" "She is ready for another 8 years !?" Individual A then responds to Individual C message about the meeting by saying "On Agenda!" Then Individual A and Individual C talk about coordinating a dinner with Vazquez for 2/14/20.	<u>DOJ-</u> <u>0001195945</u>	DOJ- 0001195954
50.	2020.02.12	Individual A and Vazquez's Chief of Staff exchange messages via text message Vazquez's Chief of Staff tells Individual A he will call her right back and Individual A tells Vazquez's Chief of Staff she just wanted to know about OCIF Commissioner A because Vazquez" asked her.	<u>DOJ-</u> <u>0001189395</u>	DOJ- 0001189396

No.	Date	Description	Bates Start	Bates End
51.	2020.02.14	Diaz messages Herrera via WhatsApp and tells him that Blakeman asked Individual A for a meeting with the governor and told her to be prepared because they were going to come off awful. Diaz tells Herrera that Individual A told Blakeman both her and the governor were attending the dinner at Individual C's house that night and that Individual A would bring up the topic and request the governor for it to be Individual A the person to take care of the task on Monday. Diaz then continues to explain to Herrera that the instruction had been given to someone who didn't follow it and Individual A was now going to deal with it directly, despite of that not being her responsibility. Herrera then responds that he was told the same thing by Individual C, that Individual A would be asking to take charge, and tells Diaz "We are all on the same page."	<u>DOJ-</u> <u>0006915745</u>	DOJ- 0006915745
52.	2020.02.20	Individual A messages Individual D and Blakeman to let them know about the meeting with International Consulting Firm on 2/28/20 and provide guidance on how to prepare ahead of the meeting. Blakeman responds that International Consulting Firm is costing Julio 500k and, for that reason, Blakeman gets mad about OCIF and COSSEC.	<u>DOJ-</u> <u>0001190192</u>	DOJ- 0001190195
53.	2020.02.20	Individual A messages Individual B via WhatsApp and tells her that the old man OCIF Commissioner A needs to be fired. Individual A asks Individual B how can Vazquez's Chief of Staff do that asap and Individual B responds "Tell him"... "to tell him that" "G." Individual A responds "the old [man] is here. Should take advantage of that"	<u>DOJ-</u> <u>0001202503</u>	DOJ- 0001202504
54.	2020.02.22	Individual A messages Individual B asking for her to "come here please. I told Blakeman the one from OCIF will end on Friday February 27."	<u>DOJ-</u> <u>0000640385</u>	DOJ- 0000640386



No.	Date	Description	Bates Start	Bates End
55.	2020.02.22	Individual A messages Individual A via WhatsApp "That of OCIF really has me stressed", and tells Individual B that Individual C has already warned her.	<u>DOJ-0001202531</u>	DOJ-0001202533
56.	2020.02.23	Vazquez's Chief of Staff sends a message (via WhatsApp group chat) to Individual D and Blakeman saying Please communicate with A.	<u>DOJ-0001187836</u>	DOJ-0001187836
57.	2020.02.23	Herrera messages Diaz via Whatsapp and tells her "I passed along WB's proposal to JB." Then, Herrera sends Diaz a pptx document titled "Campaign Support Proposal_Puerto Rico.pptx", which in turn is followed by a message that reads "Let's see if they have the willingness and capability"	<u>DOJ-0006915748</u>	DOJ-0006915749
58.	2020.02.23	Individual C sends Vazquez and Individual A via a text message group chat a document named "Campaign Support Proposal_Puerto Rico.pptx.pptx." The document is a powerpoint presentation titled " International Consulting Firm Campaign Support Proposal for Governor Wanda Vazquez"	<u>DOJ-0000714546</u>	DOJ-0000714546
59.	2020.02.22	Individual C forwarded to Individual A a message sent from Herrera to Individual C in which Herrera wrote, "Well I am meeting [a partner from the International Consulting Firm] at 3:00 pm We need to confirm the meeting since we are 5 people crossing the Atlantic to meet her and we also need her support for the Ocif situation that can no longer wait ! ! Please talk to the Governor if necessary but we should not spend money, Time and Effort in people that do not need our help!! Best Regards."	DOJ-0075363	DOJ-0075363

No.	Date	Description	Bates Start	Bates End
60.	2020.02.24	Diaz WhatsApp message to Herrera stating that OCIF Commissioner A is being dismissed the next Friday, but that he will stay until the end of the month. In the conversation, Herrera tells Diaz “that is the day of the meeting with WB”, “28 F.”	<u>DOJ-0004239097</u>	DOJ-0004239097
61.	2020.02.24	Individual A asks Blakeman over text message “who will be staying in OCIF?.” Blakeman responds on 2/25/20 “Called.”	<u>DOJ-0001183617</u>	DOJ-0001183617
62.	2020.02.25	Individual A responds to Individual C regarding the message he forwarded her from his conversation with Herrera. Individual A tells Individual C, amongst other things, that the meeting has been confirmed for the 28th and that she believes Herrera’s message to be unfair. Later in the conversation, Individual A asks Individual A for a room at the Vanderbilt to hold a meeting that same day from 6-8pm.	<u>DOJ-0001195990</u>	DOJ-0001195991
63.	2020.02.25	Individual A sends Individual B (via WhatsApp) a screenshot of a message from Individual C and tells Individual B the screenshot is a message Julio sent to Individual C. Individual B tells Individual A to tell Individual C that “[the person] will leave end of the month” and that she (Individual B) will take care of it the next day. Individual A proceeds to tell Individual B that she’s upset about the message sent by Individual C and sends Individual B a screenshot of her response to Individual C.	<u>DOJ-0001202552</u>	DOJ-0001202554
64.	2020.02.27	Julio Herrera sends John Blakeman a picture of International Consulting Firm-Partner 2 business card and a link to International Consulting Firm’s web page. Blakeman responds by telling Herrera that he will see Herrera “tomorrow.”	<u>DOJ-0001186010</u>	DOJ-0001186011

No.	Date	Description	Bates Start	Bates End
65.	2020.02.27	Individual A messages the following to Individual C (via text message): "See u on friday @ 6pm. Individual D, Blakeman and O are coming with us. FYI. Today I talked to OCIF Commissioner A . He's resigning effective February 28. Finally!"	<u>DOJ-0001190273</u>	DOJ-0001190273
66.	2020.02.27	Individual A messages OS via WhatsApp to let him know there will be a meeting on 2/28/20 at 6pm at the Vanderbilt with a company "that will assist in the campaign." OS responds "Ok."	<u>DOJ-0001203765</u>	DOJ-0001203765
67.	2020.02.27	OCIF Commissioner A visits Fortaleza to hand in a document to AP.	<u>DOJ-0000058776</u>	DOJ-0000058779
68.	2020.02.28	Blakeman and Diaz exchange text messages. Blakeman says "they" are leaving Fortaleza and Diaz responds "they" are leaving the bank	<u>DOJ-0001184134</u>	DOJ-0001184134
69.	2020.02.28	Herrera communicates with John Blakeman via WhatsApp. His message to Blakeman reads "Dear John: After today's presentation we need 15 minutes with the Madam to explain some details of the next steps and coordinate the final objective of our regulator and the people that act irregularly inside the office. In conclusion to make a coordinated plan of action. Of course, your presence is important in that private discussion. Hug" In response, Blakeman tells Herrera "Of course. Count on me."	<u>DOJ-0001186011</u>	DOJ-0001186011



No.	Date	Description	Bates Start	Bates End
70.	2020.02.28	John Blakeman asks Individual A (via a text message group chat including OS and Individual D) to try and delay the start time of the meeting at the Vanderbilt. In response, Individual A tells the group that the meeting needs to start at 6pm sharp because [the people] cannot do any other time and that they had established a rule that, once the meeting started, no one would be able to enter the meeting.	<u>DOJ-0001193993</u>	DOJ-0001194001
71.	2020.02.28	Individual A sends Individual C a picture of OCIF Commissioner A's resignation letter, followed by a text that says "FYI <3." Individual C the responds "Miss. See u 6pm!"	<u>DOJ-0001196018</u>	DOJ-0001196019
72.	2020.02.28	Individual A sends John Blakeman, via WhatsApp, a picture of OCIF Commissioner A's resignation letter	<u>DOJ-0001198532</u>	DOJ-0001198573
73.	2020.02.28	Individual A sends Individual C a picture of OCIF Commissioner A's resignation letter, followed by a text that says "FYI <3." Individual C the responds "Miss. See u 6pm!"	<u>DOJ-0001182024</u>	DOJ-0001182024
74.	2020.02.28	Individual A's text message to Blakeman containing a photograph of OCIF Commissioner A's resignation letter.	DOJ-0001198547	DOJ-0001198547
75.	2020.02.29	Frances Diaz sends Blakeman OCIF Commissioner B's CV.	<u>DOJ-0004238886</u>	DOJ-0004238886



No.	Date	Description	Bates Start	Bates End
76.	2020.02.29	OCIF Commissioner B's CV being circulated by Herrera to Rossini and Diaz stating that he's the perfect man for the job. Right after sharing OCIF Commissioner B's CV, Herrera sends them a message that reads "This is our men for OCIF", in reference to OCIF Commissioner B.	<u>DOJ-0004239339</u>	DOJ-0004239341
77.	2020.02.29	Herrera communicates with John Blakeman via WhatsApp and tells him it would be good to have a meeting the following week. Herrera tells Blakeman "We are forming the Super Pac and all the necessary platform from the office in washington." In response, Blakeman reminds Herrera that they need to verify the matter of Blakeman's position in the team, and asks Herrera to let him know the legal opinion. Herrera then tells Blakeman "Yes, of course! You need to be protected."	<u>DOJ-0001186012</u>	DOJ-0001186013
78.	2020.02.29	Vazquez asks Individual A (via WhatsApp) "what is the name of the [guy] from the FBI?", to which Individual A responds "Mark Rossini"	<u>DOJ-0001204585</u>	DOJ-0001204585
79.	2020.02.29	OCIF Commissioner B sends Herrera his CV via email	<u>DOJ-0000737641</u>	DOJ-0000737641

No.	Date	Description	Bates Start	Bates End
80.	2020.02.29	OCIF Commissioner B's CV being circulated by Herrera to Rossini and Diaz stating that he's the perfect man for the job. Right after sharing OCF Commissioner B's CV, Herrera sends them a message that reads "This is our men for OCIF", in reference to OCIF Commissioner B	<u>DOJ-0001182115</u>	DOJ-0001182116
81.	2020.02.29	Diaz messages Herrera, to which Herrera later responded, OCIF Commissioner B is convinced and understands that this is a State problem!! We need guarantees for him and an open line with Fortaleza but he is convinced that it's a necessity."	<u>DOJ-0001182117</u>	DOJ-0001182118
82.	2020.03.01	Blakeman and International Consulting Firm-Partner1 exchange messages	<u>DOJ-0001181979</u>	DOJ-0001181980
83.	2020.03.02	Herrera tells Blakeman (via WhatsApp) "With OCIF Commissioner B we have the banks and federal regulators calmed. This way I can dedicate time and money to his/her campaign. Tomorrow I am in San Juan and I have a call with the campaign expert from Washington then I travel to London to set up the long-term strategy."	<u>DOJ-0001186021</u>	DOJ-0001186024
84.	2020.03.02	Blakeman forwards Herrera's message about OCIF Commissioner B to Individual A	<u>DOJ-0001186129</u>	DOJ-0001186921

No.	Date	Description	Bates Start	Bates End
85.	2020.03.04	Frances Diaz tells Blakeman to not forget about the meeting with O. Blakeman and Diaz discuss Julio's desire to meet with O and G Diaz tells Blakeman that the topic for the meeting with O is "the campaign" and Blakeman tells Diaz that, because O is a public employee, it would not be good optics for Julio to meet with him in the middle of the OCIF transition.	<u>DOJ-</u> <u>0004238876</u>	DOJ- 0004238880
86.	2020.03.04	HG messages Individual A (text message) and sends her a memo regarding the way to fill the vacancy of the OCIF Commissioner position after an OCIF Commissioner resigns. Gonzalez explains to Individual A that OCIF Commissioner A must appoint a sub commissioner before he resigns. Individual A tells HG "we want someone from outside ..."	<u>DOJ-</u> <u>0001190543</u>	DOJ- 0001190612
87.	2020.03.04	Individual A sends Vazquez's Chief of Staff via WhatsApp OCIF Commissioner B's CV and sends him a message that reads: "This is the person for OCIF Commissioner B to appoint as sub commissioner tomorrow." Individual A explains to Vazquez's Chief of Staff the plan of naming OCIF Commissioner B sub commissioner so he can stay as acting commissioner and later be appointed to the commissioner position. In response, Vazquez's Chief of Staff tells Individual A that he will call her later to talk about the resume.	<u>DOJ-</u> <u>0001194384</u>	DOJ- 0001194385
88.	2020.03.04	Individual A messages Individual B (via WhatsApp) and tells her to "call Individual C." Later that same day, Individual A sends Individual B, via WhatsApp, a screenshot of a text message conversation she had with Vazquez's Chief of Staff. In the screenshot, which includes OCIF Commissioner B's CV, Individual A tells Vazquez's Chief of Staff that OCIF Commissioner B is the person that OCIF Commissioner A will need to appoint as sub commissioner. In her message to Individual B, Individual A says "I sent this to Vazquez's Chief of Staff. Please call him so he does it!!!" Individual B tells Individual A she will call Vazquez's Chief of Staff	<u>DOJ-</u> <u>0001201828</u>	DOJ- 0001203555



No.	Date	Description	Bates Start	Bates End
89.	2020.03.05	Individual A messages Individual B, says “Remember to tell Vazquez’s Chief of Staff that OCIF Commissioner A must appoint a subcommissioner today!!” Individual B responds via WhatsApp that OCIF Commissioner A will not be appointing anyone before leaving; and OCIF Commissioner A has said he knows why he is being kicked out.	<u>DOJ-0001201828</u>	DOJ-0001203555
90.	2020.03.10	Herrera sends Blakeman a message via WhatsApp that reads “1) Reserch 2) Campaign strategy expert 3) Superpac DC 4) Campaign strategy implementation”, followed by a pdf document named “7280 Britannia Fin Servs Ltd.pdf.pdf.” In response, Blakeman tells Herrera that he will be calling him later. Later in the conversation, Herrera sends Blakeman what appears to be a picture containing information about “Political Consultant A”, followed by a message that reads “campaign strategists.”	<u>DOJ-0001186037</u>	DOJ-0001186039
91.	2020.03.10	Blakeman asks Individual A if OCIF Commissioner B has already been interviewed. No response from Individual A.	<u>DOJ-0001186136</u>	DOJ-0001186137
92.	2020.03.10	Blakeman asks Individual B if OCIF Commissioner B, from OCIF, has been interviewed. Individual B “I’ll ask.”	<u>DOJ-0001188477</u>	DOJ-0001188478
93.	2020.03.10	Individual A sends Individual B a copy of OCIF Commissioner B’s CV, followed by a text message that says “ This is OCIF’s. To interview him”	<u>DOJ-0001202772</u> , <u>DOJ-0001182028</u>	DOJ-0001202773 , <u>DOJ-0001182028</u>

No.	Date	Description	Bates Start	Bates End
94.	2020.03.13	Herrera messages Blakeman about moving forward with Wanda's Superpac. Later in the same conversation, Herrera sends a message to Blakeman inquiring about any "novelties" from OCIF. In response, Blakeman tells Herrera that he will follow-up again with Fortaleza because they haven't learned how to multitask. Blakeman tells Herrera "if you want I can text Individual A too so she can help me with that." Herrera then tells Blakeman that [they] have already done that and she hadn't responded. Herrera tells Blakeman he had only said hello to her. Blakeman tells Herrera "Ok. I'll keep pushing from my end." Later in the conversation, Herrera sends Blakeman a link to the web page for Caplin and Drysdale showing information about TP. Immediately after the link, Herrera sent Blakeman a message that reads "Sperpac."	<u>DOJ-</u> <u>0001185959</u>	DOJ- 0001186105
95.	2020.03.13	Blakeman messages Individual B and tells her to check on the OCIF matter when she gets a chance.	<u>DOJ-</u> <u>0001188485</u>	DOJ- 0001188485
96.	2020.03.15	Individual C messages Individual A and follows up by asking when there will be a commissioner for OCIF.	<u>DOJ-</u> <u>0001190175</u>	DOJ- 0001190175
97.	2020.03.20	Herrera sends Blakeman via WhatsApp what appears to be a screenshot from a conversation Herrera had International Consulting Firm-Partner 2, followed by a message that reads "Working on project W." Blakeman responds "Perfect. Working on Coronavirus right now." Following Blakeman's message, Herrera sends a message to Blakeman that reads "BTW: they never call OCIF Commissioner B"	<u>DOJ-</u> <u>0001185959</u>	DOJ- 0001186105

No.	Date	Description	Bates Start	Bates End
98.	2020.03.23	Individual A messages Individual B via WhatsApp and tells her "Individual C with that of OCIF" and sends Individual B a screenshot of messages she received from Individual C following up on the OCIF matter	<u>DOJ-0001202854</u>	DOJ-0001202854
99.	2020.03.25	Herrera messages Blakeman via WhatsApp what appears to be a screenshot of a conversation he had with International Consulting Firm-Partner 2 and a message that reads "We are continuing with our plan." Blakeman responds "Great!" and proceeds to let Herrera know that he is at Fortaleza working with virus related matters. Blakeman tells Herrera that he believes that the way the crisis is being handled is helping the "G." In response, Herrera tells Blakeman they have "to call OCIF Commissioner B because after [the virus] a lot of help and coordination will be needed to boost the island. Herrera tells Blakeman "Remember that 2+2 is not 4 in politics. Anything can happen until November." Blakeman agrees. Then Herrera continues by telling Blakeman "I believe that now that no one is interested in OCIF because of everything else is the moment! Don't waste the opportunity" "Speak with the madam." Blakeman then tells Herrera that he will be following-up on the matter and tells Herrera that Blakeman wouldn't "be seeing her today but I understand I will [be seeing her] tomorrow.	<u>DOJ-0001185959</u>	DOJ-0001186105
100.	2020.03.25	Rossini tells Blakeman that he's "moving forward with putting the Super PAC together.	<u>DOJ-0001181981</u>	DOJ-0001181982



No.	Date	Description	Bates Start	Bates End
101.	2020.03.30	Herrera sends WhatsApp message to Blakeman, forwarding message from OCIF Commissioner B re becoming commissioner of OCIF Blakeman responds "Perfect!! I will pass it along immediately". Later in the message exchange, Herrera sends Blakeman Political Consultant A's resume, titled "MDW Political Bio bullets.pdf.pdf.pdf", followed by a message that says "Superpac plitical coordinator !!"	<u>DOJ-0001185959</u>	DOJ-0001186105
102.	2020.03.30	Individual C sends Individual A, via WhatsApp, a document titled "MDW Political Bio bullets.pdf.pdf.pdf" followed by a message that says " Superpac Coordinator"	<u>DOJ-0001195850</u>	DOJ-0001196135
103.	2020.03.30	Herrera sends WhatsApp message to Diaz, forwarding message from OCIF Commissioner B re becoming commissioner of OCIF. Diaz responds that she has already followed up with the matter.	<u>DOJ-0006915776</u>	DOJ-0006915777
104.	2020.03.30	Individual C sends Vazquez, via WhatsApp, a document titled "MDW Political Bio bullets.pdf.pdf.pdf" and sends her a message that says "Super Pac coordinator."	<u>DOJ-0001182143</u>	DOJ-0001182144
105.	2020.04.02	Blakeman asks Individual A if Julio hasn't called her, and tells her Julio is driving him crazy asking when OCIF Commissioner B will be called in for a meeting in Fortaleza. Individual A doesn't respond.	<u>DOJ-0001186142</u>	DOJ-0001186143

No.	Date	Description	Bates Start	Bates End
106.	2020.04.09	Rossini WhatsApp message to Blakeman sharing “the report by the London folks” and instructing him “PLEASE DO NOT PRINT OR SHARE with anyone.” The document sent by Rossini to Blakeman is titled “Project_Hirst_Qualitative_Report_Final_.”	<u>DOJ-0001187303</u>	DOJ-0001187303
107.	2020.04.09	After Rossini sends Blakeman International Consulting Firm’s Research, Individual C messages Vazquez (via text message) that the “first survey is in”, and sends her an attachment. Vazquez responds to Individual C that she read the documents he sent her, they look good, and goes on to vent about how hard the race against Public Official A will be due to the media support he has. Individual C proceeds to cheer up Vazquez and tells her “let me know when we meet to give you all this report too.” Individual C also tells her that “Mark will contact you to set up a video call to share the research and next steps.”	<u>DOJ-0000714468</u>	DOJ-0000714506
108.	2020.04.09	John Blakeman messages Individual A, Individual B and Individual D via Telegram group chat. Blakeman tells the group that he hopes they can review the report he has prepared for them and tells them that, should they look at it closely, they will see what the next steps are for the group to follow in the upcoming months. Following this message, Blakeman sends the group a document named “Project Hirst Qualitative Report Final ”	<u>DOJ-0001211188</u>	DOJ-0001211188
109.	2020.04.10	Blakeman follows up with Individual B, Individual A and Individual D, via Telegram group chat, and asks if anyone has been able to read the report he sent them the day before, and attaches the Project Hirst Qualitative Report. In response, Individual D tells Blakeman “I’m on it.”	<u>DOJ-0001211188</u>	DOJ-0001211188



No.	Date	Description	Bates Start	Bates End
110.	2020.04.11	Blakeman messages Individual B via WhatsApp and asks her to “take a look at the report” he sent her. Blakeman tells Individual B the report is from the “London people”. Individual B responds ok.	<u>DOJ-0001188504</u>	DOJ-0001188505
111.	2020.04.14	Rossini message to Blakeman asking if he discussed the “London Folks” report with “principal subject”	<u>DOJ-0001182131</u>	DOJ-0001182132
112.	2020.04.16	Individual C tells Individual A, via WhatsApp, “Super pac. Ready”, right after having sent Individual A a link for the SuperPAC 1’s website	<u>DOJ-0001195850</u>	DOJ-0001196135
113.	2020.04.16	Individual C messages Vazquez “this is the super pc governor. It’s created in DC. Ready.” After having sent her the link to the Super Pac’s website.	<u>DOJ-0000714468</u>	DOJ-0000714506
114.	2020.04.18	Herrera sends Diaz, via WhatsApp, the internet link for the Prosperity through Leadership PAC, and two pdf documents titled (1) “Why_Act_Now_v1.pdf” and (2) “SuperPAC 1_C4_Wiring_Instructions.pdf.” Subsequently, Herrera tells Diaz “The ball is in the madam’s possession” and Diaz, in response, agrees	<u>DOJ-0006915093</u>	DOJ-0006915094
115.	2020.04.18	Herrera sends Blakeman, via WhatsApp, information and documents re “SuperPAC1 (amongst them a document titled “SuperPAC1_C4 wiring instructions”) and tells Blakeman ““Ready when you are.” Blakeman responds that he’s finishing up in a meeting and he’ll read it when on his way. Herrera then responds “Superpac ready” “The question if [he/she] will need us or is no longer interested for x or z [reason]”	<u>DOJ-0001186061</u>	DOJ-0001186063

No.	Date	Description	Bates Start	Bates End
116.	2020.04.28	Herrera sends Diaz via WhatsApp a pdf document titled "Research Presentation.pdf", followed by messages that say "Your Friend", "W."	<u>DOJ-0006915791</u>	DOJ-0006915791
117.	2020.05.04	Blakeman and Frances Diaz talk about a conference call that Blakeman had with Julio and Individual C	<u>DOJ-0004238873</u>	DOJ-0004238873
118.	2020.05.04	Rossini messages (WhatsApp) Blakeman and tells him "Just a reminder we have that call 12:30 your time which is 17:30 London time. I will send the link shortly. After we speak with the London firm, he will leave the call and Political Consultant A, who started the Super PAC will join to go over the PAC's efforts etc." Blakeman tells Rossini that CJ will not be able to make the call.	<u>DOJ-0001181747</u>	DOJ-0001181749
119.	2020.05.05	Individual D messages Blakeman and tells him that O told him to tell Blakeman that they are going to postpone the meeting for 5/6/20 because everyone -for 5/6/20, same time. Blakeman responds "ok."	<u>DOJ-0001186858</u>	DOJ-0001186858
120.	2020.05.05	Individual B messages Blakeman and tells him "I'll see you today." Blakeman responds "Ok."	<u>DOJ-0001188514</u>	DOJ-0001188514

No.	Date	Description	Bates Start	Bates End
121.	2020.05.06	Rossini sends Blakeman a document titled "Talking Points" followed by information and instructions that must be passed on to the governor. The instructions include a message that Rossini had previously received from Political Consultant A and later shared with Blakeman in which she announces she is firing JD as her campaign manager, amongst other things. Rossini messages Blakeman asking to advise his "friend" that the people behind the Pac want an affirmation that she's decided to win the election. Rossini tells Blakeman "The PAC will kick into gear and publicly she can see the PAC's actions and follow through and expand upon it." Blakeman responds that he's on his way to Fortaleza.	<u>DOJ-0001187311</u>	DOJ-0001187314
122.	2020.05.06	Blakeman answers to a request for a call from Individual C by calling him via WhatsApp.	<u>DOJ-0001181925</u>	DOJ-0001181926
123.	2020.05.06	Rossini messages Herrera, "John is seeing her at 5 pm. I've been in touch with John over the last hour. He is aware." Rossini later informed Herrera via text message that he had just received a message from "John" that "he is on his way to see his friend. I provided him all the materials, except of course the budget breakdown."	DOJ-0006915543	DOJ-0006915543
124.	2020.05.06	Rossini messages Individual C, "He sees her at 5 today"	DOJ-0006915543	DOJ-0006915543
125.	2020.05.07	Blakeman asks Julio for OCIF Commissioner B contact information and tells him OCIF Commissioner B should be receiving a call between 5/7/20 and 5/8/20. He then tells Julio that Frances Diaz gave him the contact information	<u>DOJ-0001186072</u>	DOJ-0001186073



No.	Date	Description	Bates Start	Bates End
126.	2020.05.07	Individual D asks Blakeman to give him OCIF's thing. Blakeman responds he just asked for it and will let him know. Then Blakeman sends him OCIF Commissioner B's contact information and tells OCIF Commissioner B "this is the person."	<u>DOJ-0001186858</u>	DOJ-0001186859
127.	2020.05.07	Blakeman asks Frances Diaz for OCIF Commissioner B's contact information and she provides it	<u>DOJ-0001187148_000994</u>	DOJ-0001187148_000994
128.	2020.05.07	Vazquez's Chief of Staff is sent OCIF Commissioner B's contact information by someone who tells him that OCIF Commissioner B is the person that he had talked to Vazquez's Chief of Staff about the day before. [The person] also tells Vazquez's Chief of Staff that it is important to resolve the OCIF matter.	<u>DOJ-0000058790</u>	DOJ-0000058791
129.	2020.05.07	Rossini messages Blakeman, "Good morning John. How did your meeting go? Have you spoken with Julio Herrera or Individual C." Blakeman responds, "Spoke to Individual C last night. It was a great meeting. They morning they ask me for the number of the proposed new director of OCIF. (What Julio needed)". Rossini responds, "Oh fantastic. Great news."	<u>DOJ-0000075348</u>	<u>DOJ-0000075348</u>
130.	2020.05.07	Rossini forwards message he sent to Blakeman to Herrera and writes, "What I sent"	DOJ-0006915544	
131.	2020.05.07	Rossini messages Blakeman stating in part "Hi John: I just spoke to a mutual friend whom advised that if/when that gentleman is installed as the OCIF director that with 72 hours 'the switch will be turned on' and the PAC will be on the island forging ahead." Rossini then sent that same message to Herrera with the explanation, translated from Spanish to English, "What I sent."	<u>DOJ-0001182133</u>	DOJ-0001182133

No.	Date	Description	Bates Start	Bates End
132.	2020.05.07	Blakeman sends OCIF Commissioner B's contact information and tells Herrera that OCIF Commissioner B should expect a call between May 7 and May 8	DOJ-0001186072	
133.	2020.05.07	Rossini messages Herrera that he (Rossini) understands from Blakeman that the message was "delivered loud and clear" and his amiga is "on board."	DOJ-0006915543	
134.	2020.05.08	Blakeman messages Individual D and tells him not to forget about OCIF. Individual D responds he just hung up the phone with [someone] and [that person] will be dealing with appointees "next week." Blakeman complains and asks if [the person] can't give the guy a call "tomorrow" and tell him to swing by "next week" to "relief the pressure."	<u>DOJ-0001186862</u>	DOJ-0001186862
135.	2020.05.08	Blakeman tells Frances Diaz he arrived to Fortaleza.	<u>DOJ-0001187148_001001</u>	DOJ-0001187148_001001
136.	2020.05.08	Individual B messages Blakeman and tells him she's in "post 10" and that "they're waiting for your ok."	<u>DOJ-0001188514</u>	DOJ-0001188514
137.	2020.05.12	Rossini messages Blakeman over WhatsApp and asks if the advice provided has been implemented. Blakeman responds to Rossini that "they are implementing the recommendations." Then Blakeman proceeds to tell Rossini that "The guy for OCIF went to Fortaleza and was interviewed"	<u>DOJ-0001181996</u>	DOJ-0001181997

No.	Date	Description	Bates Start	Bates End
138.	2020.05.12	Rossini messages Herrera, "This is what I just sent to John Blakeman" then sends Herrera the above message about "implementing the recommendations." Then, Rossini messages Herrera and tells him "the guy for OCIF went to Fortaleza and was interviewed. That's a relief. She gets it now." Herrera then complains "Yes but not with her!!! He just meet with the secretary," then, "they are moving very slow."	<u>DOJ-0001182141</u>	DOJ-0001182142
139.	2020.05.13	Blakeman forwards a message to Diaz via WhatsApp that says the designations for OCIF and Health have been confirmed.	<u>DOJ-0001187148_001067</u>	DOJ-0001187148_001067
140.	2020.05.13	OS messages Blakeman and tells him the designations for OCIF and Health have been confirmed.	<u>DOJ-0001188133</u>	DOJ-0001188134
141.	2020.05.14	Rossini messages Blakeman and says "Hi John. Just checking in again. The PAC gent is waiting to get there. Hope your friend is following through on the recommendations... gracias". Blakeman then sends Rossini several documents confirming OCIF Commissioner B's appointment of the new OCIF Commissioner.	<u>DOJ-0001187318</u>	DOJ-0001187319
142.	2020.05.14	Blakeman sends Julio Herrera a document that states that the governor has appointed a new OCIF Commissioner.	<u>DOJ-0001186074</u>	DOJ-0001186074
143.	2020.05.14	Individual D sends Blakeman a document that states that the governor has appointed a new OCIF Commissioner.	<u>DOJ-0001186863</u>	DOJ-0001186863



No.	Date	Description	Bates Start	Bates End
144.	2020.05.14	Blakeman and Diaz discuss OCIF Commissioner B's appointment via WhatsApp. Diaz sends Blakeman a news article about the appointment and Blakeman forwards Diaz a pdf document named "Gobernadora_Vazquez_Garced_designa_secretario de la Familia y Comisionado."	<u>DOJ-0001187148_001076</u>	DOJ-0001187148_001078
145.	2020.05.14	Diaz sends Herrera, via WhatsApp, a news article titled "Wanda Vazquez appoints Housing Secretary and OCIF Commissioner." In response, Herrera sends Diaz a pdf Document named in part "Gobernadora_Vazquez..."	<u>DOJ-0006915800</u>	DOJ-0006915800
146.	2020.05.14	OCIF Commissioner B appointed as new OCIF Commissioner	<u>DOJ-0001182136</u>	DOJ-0001182138
147.	2020.05.14	Rossini sends Herrera announcement that OCIF Commissioner B is appointed as new OCIF Commissioner. Herrera responds, "Prepare Political Consultant A" and "Looks like we are playing balls"	<u>DOJ-0001182139</u>	DOJ-0001182139
148.	2020.05.14	Rossini messages an employee of International Consulting Firm, "Hi. Sorry for the late hour. Just got word to 'prepare Political Consultant A.' Talk tomorrow." The employee of the International Consulting Firm responded, "Prepare for take off?" Rossini replies, "Buckle your seatbelts."	DOJ-0000433684	DOJ-0000433684
149.	2020.05.14	Individual C congratulates Herrera, messaging, "Finally u have power here sir," then informs Herrera that OCIF Commissioner B would be confirmed by the Puerto Rico Senate "as soon as senate is in session." In response, Herrera writes, "amen" and that they should "keep it very ND." Individual C replies that power "wont last" unless it is "always silent."	DOJ-0001182361 (pg 26)	DOJ-0001182361 (pg 26)

No.	Date	Description	Bates Start	Bates End
150.	2020.05.21	Political Consultant A arrives to PR and reaches out to John Blakeman. Blakeman asks him to meet on 5/22/20 at La Concha at 2:30pm	<u>DOJ-0001181887</u>	DOJ-0001181890

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will notify all counsel of record.

RESPECTFULLY SUBMITTED, this 30th day of August, 2024.

COREY R. AMUNDSON  
Chief, Public Integrity Section  
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